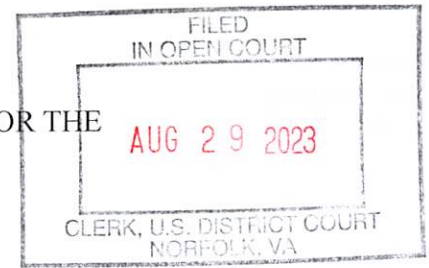


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Newport News Division



UNITED STATES OF AMERICA

v.

Case No. 4:22-cr-44

DARTANGUIA ANTONIOUS LEE,

Defendant.

STATEMENT OF FACTS

The United States and the defendant, DARTANGUIA ANTONIOUS LEE, (hereinafter, “the defendant”), agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. In or about July 2019, the defendant became romantically involved with A.T. The defendant and A.T. cohabitated from in or about September 2019, to in or about March 2020.
2. Beginning in or about December 2019, and continuing until in or about March 2020, in the Eastern District of Virginia, A.T. purchased nineteen (19) firearms, worth approximately \$4,000, at the behest of defendant.
3. The defendant was a prior convicted felon who knew he could not lawfully possess a firearm. At the time A.T. straw purchased the firearms for the defendant, the defendant had been convicted of the following felonious crimes of violence:

Offense of Conviction	Offense Committed On
Robbery with Dangerous Weapon	December 5, 2009
Robbery with Dangerous Weapon	December 6, 2009
Robbery with Dangerous Weapon	December 9, 2009
Robbery with Dangerous Weapon	December 10, 2009
Robbery with Dangerous Weapon	December 10, 2009

4. In order to purchase the nineteen (19) firearms for the actual transferee/buyer – the defendant – A.T. knowingly made false and fictitious statements to the dealers to obtain the firearms for defendant.

5. The false and fictitious statements were intended and likely to deceive the licensed dealers of firearms as to facts material to the lawfulness of the sale.

6. The false and fictitious statements caused the licensed dealers of firearms to violate their record keeping obligations under federal law.

7. One of the 19 firearms A.T. straw purchased for the defendant was a Taurus, Model G2C, 9mm semiautomatic handgun, S/N: TMS51726 (hereafter “the Firearm”).

8. A.T. unlawfully straw purchased the Firearm on March 2, 2020, from Chesapeake Pawn & Gun, a licensed firearms dealer, or Federal Firearms Licensee (FFL), located on South Military Highway in Chesapeake, Virginia.

9. On or about March 2, 2020, in the Eastern District of Virginia, the defendant, DARTANGUIA ANTONIOUS LEE and A.T., in connection with the acquisition of the Firearm, from a FFL within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious oral and written statement to the FFL, which statement was intended and likely to deceive the FFL as to a fact material to the lawfulness of such sale of the Firearm to the defendant under Chapter 44 of Title 18, in that A.T. represented to be the actual transferee/buyer of the Firearm when, in fact, A.T. and the defendant then knew, the defendant was the actual transferee/buyer of the Firearm, in violation of Title 18 United States Code, Sections 922(a)(6); 924(a)(2); and 2.

10. On or about March 2, 2020, in the Eastern District of Virginia, the defendant, DARTANGUIA ANTONIOUS LEE and A.T., knowingly made a false statement and

representation to a FFL within the meaning of Chapter 44, Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of a FFL, in that A.T., did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, to the effect that A.T. was the actual transferee/buyer of the Firearm on the Form 4473, when in fact A.T. and the defendant then knew, the defendant was the actual transferee/buyer of the Firearm, in violation of Title 18 United States Code, Sections 924(a)(1)(A) and 2.

11. The Firearm had been in and effected interstate and foreign commerce.

12. The defendant possessed the Firearm on or about March 3, 2020.

13. Prior to March 3, 2020, the defendant knew he had been convicted of the felonious crimes of violence outlined in paragraph 3 above.

14. The defendant did not have has civil rights restored prior to possessing the Firearm.

15. On or about March 3, 2020, in the Eastern District of Virginia, the defendant, DARTANGUIA ANTONIOUS LEE, having knowingly been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess a firearm, to wit: a Taurus, Model G2C, 9mm semiautomatic handgun, S/N: TMS51726, which had been in and effected interstate and foreign commerce.

16. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the United States. It does not include each and every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

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17. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,

Jessica D. Aber
United States Attorney

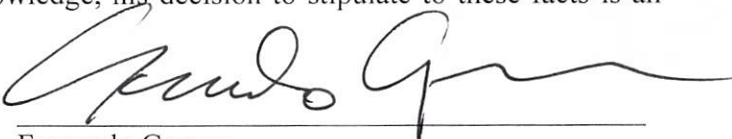
By: 

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After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, DARTANGUIA ANTONIOUS LEE, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.


DARTANGUIA ANTONIOUS LEE

I am Fernando Groene, defendant's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.


Fernando Groene
Attorney for DARTANGUIA ANTONIOUS LEE

Handwritten initials and marks:
- "D.K." in the top right
- "G.H." in the bottom right
- "1.0." in blue ink at the bottom right